

REMARKS/ARGUMENTS

Applicants respond herein to the Office Action issued on April 24, 2008. A Petition for Extension of Time (three months) and the fee therefor are submitted herewith.

Claims 1, 5-8, 10-13, 15-27, 30-38, 40-49, 51-52, 54-59, 62-74, 78-79 and 82-110 are pending in the Application. All pending claims were rejected in the Office Action. Applicants amend Claims 1, 5-8, 40, 59, 66-68, 78-79, 82-85, 87-89, 91-96 and 99-101 and respectfully request reconsideration of the rejections. Claims 5-8, 40, 66-68, 79, 82-85, 87-89, 91-96 and 99-101 were amended for reasons of clarity and not patentability.

Claims 1, 5-8, 10-13, 15-19, 21-22, 31-40, 25-27, 52, 59, 62-65, 67-68, 70, 88, 91-96 and 103-110 were rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Friday (7,260,408), in view of Nakagawa (2006/0056855) ("Nakagawa"). Claims 20, 23-24, 30, 87 and 89-90 were rejected under 35 U.S.C. 103(a) as being unpatentable over Friday, in view of Nakagawa, and further in view of the Examiner's Official Notice. Claims 41, 43-45, 71-74 and 97-98 were rejected under 35 U.S.C. 103(a) as being unpatentable over Friday, in view of Nakagawa, and further in view of Beeson (5,396,543). Claims 42, 49 and 51 were rejected under 35 U.S.C. 103(a) as being unpatentable over Friday, in view of Nakagawa and Beeson, and further in view of Rieser (2001/0034223). Claims 47-48 and 78-79 were rejected under 35 U.S.C. 103(a) as being unpatentable over Friday, in view of Nakagawa, and further in view of Rieser. Claims 54,55-58, 82 and 83-86 were rejected under 35 U.S.C. 103(a) as being unpatentable over Friday, in view of Nakagawa and Rieser, and further in view of Papadimitriou (6,385,458). Finally, Claims 99-102 were rejected under 35 U.S.C. 103(a) as being unpatentable over Friday, in view of Nakagawa, and further in view of Ryan (2005/0109841).

Claims 1 and 59 recite a system and method, respectively, for detecting a position of a terminal. As illustrated in Fig. 1 of the Application, the system includes an illumination device (103), which is communicably connected to the terminal (101-104) such that the illumination device transmits a signal to the terminal. The signal includes a unique information which is received and extracted by the terminal (101-104). The system further includes a position estimation device (102-109-110) communicably connected to the terminal and receiving an illumination installation position information from the terminal. The illumination installation

position information received by the position estimation device from the terminal includes the unique information and a position information indicating the installation position of the illumination device in association with each other. Finally, the position estimation device estimates a position of the terminal based on the illumination installation position information and the unique information received by the position estimation device from the terminal.

Contrary to the recitation of Claim 1 and 59, Friday does not disclose a system or a method where the position estimation device receives any kind of information from the terminal. Instead, as shown in Fig. 1 of Friday, the wireless node location module 59 receives signals from the radio transceivers 58 and not from the terminal 56. Moreover, terminal 58 does not receive or extract any unique information from the signal transmitted by the radio transceivers 58. Therefore, the above limitations of Claims 1 and 59 are not disclosed or even suggested by Friday. Neither, Nakagawa nor any other cited reference remedies this deficiency of Friday. Therefore, Claims 1 and 59 are allowable over the cited prior art.

Similarly, Claim 78, as amended, recites a program for an application server in the positioning system where the illumination device transmits a signal to the terminal which is communicably connected to the illumination device. The signal includes a unique information, which is extracted by the terminal. An application server realized by a computer is connected in a communicable manner to the terminal and detects the position of the terminal based on the unique information received and extracted by the terminal. As explained above, Friday does not disclose a system where the application server is connected to the terminal or receives any kind of information from the terminal. Further, Friday does not disclose or even suggest that the terminal extracts any kind of information from the signal received from the radio transceivers. Finally, neither Nakagawa nor any other cited reference remedies this deficiency of Friday. Therefore, Claim 78 is allowable over the cited prior art.

Claims 5-8, 10-13, 15-27, 30-38, 40-49, 51-52, 54-58, 62-74, 79 and 82-110 depend directly or indirectly from Claims 1, 59 and 78. Therefore, Claims 5-8, 10-13, 15-27, 30-38, 40-49, 51-52, 54-58, 62-74, 79 and 82-110 are allowable over the cited prior art at least for the same reasons as Claims 1, 59 and 78 and, further, on their own merits.

Favorable reconsideration of the rejections and allowance of all pending claims is respectfully requested.

Accordingly, the Examiner is respectfully requested to reconsider the application, allow the claims as amended and pass this case to issue.

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Respectfully submitted,



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